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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 TONYA HALE,

11 Plaintiff,

12 vs.

13 THE COSMOPOLITAN OF LAS VEGAS;  
14 NV PROPERTY 1, LLC dba THE  
COSMOPOLITAN OF LAS VEGAS, a  
15 Nevada Limited Liability Company;  
RICHARD SHERMAN, an individual,

16 Defendants.

Case No. 19-CV-00780-JCM-VCF

**STIPULATION AND ORDER TO EXTEND  
DISPOSITIVE MOTION DEADLINE**

**Ninth Request**

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18 IT IS HEREBY STIPULATED by and between Tonya Hale (“Plaintiff”), and Nevada  
19 Property 1, LLC, doing business as The Cosmopolitan of Las Vegas (“TCOLV”) and (collectively  
20 referred to as the “Parties”), by and through their respective counsel of record, hereby stipulate to  
21 extend the deadline to file dispositive motions in this case, and agree as follows:

22 1. On November 15, 2019, this Court entered an Order granting the initial Stipulated  
23 Discovery Plan and Scheduling Order [ECF No. 31] and agreed to extend the initial deadlines on  
24 February 5, 2020 [ECF No. 35].

25 2. On April 2, 2020, this Court entered an Order granting the second request to extend  
26 the Discovery Plan and Scheduling Order [ECF No. 38], on June 24, 2020 this.

27 3. On June 24, 2020 this Court entered an Order granting the parties third request to  
28 extend the Discovery Plan and Scheduling Order [ECF No. 41] and on September 15, 2020 this

1 Court entered an Order granting the parties fourth request to extend the Discovery Plan and  
2 Scheduling Order [ECF No. 47].

3 4. On October 20, 2020, this Court entered an Order granting the parties fifth request  
4 to extend the Discovery Plan and Scheduling Order. [ECF No. 48]. Pursuant to the Court's order  
5 the deadline to file dispositive deadline is December 23, 2020.

6 5. On December 21, 2020, this Court entered an Order granting the parties sixth request  
7 to extend the dispositive motion deadline. [ECF No. 51]. Pursuant to the Court's order the deadline  
8 to file dispositive deadline is January 25, 2021.

9 6. On January 25, 2021, this Court entered an Order granting the parties seventh  
10 request to extend the dispositive motion deadline. [ECF No. 53]. Pursuant to the Court's order the  
11 deadline to file dispositive deadline is February 24, 2021.

12 7. On February 17, 2021, this Court entered an Order granting the parties an eighth  
13 request to extend the dispositive motion deadline. [ECF No. 55]. Pursuant to the Court's order,  
14 the deadline to file dispositive motion is March 26, 2021.

15 8. Complications relating to Covid exposure, counsel's medical issues, and scheduling  
16 conflicts have necessitated the extension. Accordingly, the parties request that the dispositive  
17 motion deadline be extended fifteen (15) days from to **March 26, 2021** to **April 12, 2021**.

18 9. Accordingly, the parties stipulate and agree to extend the dispositive motion  
19 deadline for fifteen (15) days, up to and including **April 12, 2021**.

20 10. As set forth in ECF No. 55, upon the filing of a dispositive motion, the date for filing  
21 the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or  
22 until further order of the court.

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11. A trial date has not yet been set in this matter, and no other deadlines are affected by this stipulation.

This stipulation and order is sought in good faith and not for the purpose of delay.

Dated this 24<sup>th</sup> day of March, 2021.

LAW OFFICES OF MICHAEL P. BALABAN JACKSON LEWIS P.C.

/s/ Michael P. Balaban

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/s/ Lisa A. McClane

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*Attorneys for Defendant Nevada Property I  
LLC dba The Cosmopolitan of Las Vegas*

**ORDER**

IT IS SO ORDERED March 25, 2021.

  
\_\_\_\_\_  
U.S. Magistrate Judge

4825-9357-1810, v. 1